



NORTH CAROLINA  
*Environmental Quality*

ROY COOPER  
*Governor*

MICHAEL S. REGAN  
*Secretary*

MICHAEL SCOTT  
*Director*

May 15, 2019

Mr. Douglas Pierotti  
City of Charlotte Engineering and  
Property Management  
600 East Fourth Street, 12<sup>th</sup> floor  
Charlotte, NC 28202-2844

Re: NCDEQ Response to Annual GW Monitoring & Receptor Sampling Reports  
Charlotte Police and Fire Training Academy (CPFTA)  
1770 Shopton Road, Charlotte, NC  
EPA ID # NCD 991 278 623

Dear Mr. Pierotti:

The North Carolina Department of Environmental Quality (NCDEQ) has reviewed the "Annual Groundwater Monitoring Report", dated December 21, 2018 and the "Supply Well and Surface Water Sampling" Report, dated March 12, 2019, all prepared by Hart & Hickman, for the CPFTA facility located at 1770 Shopton Road, North Carolina. Based upon the technical review of the reports NCDEQ has determined that the following actions need to be taken by the City of Charlotte:

- 1) A Plan must be submitted to NCDEQ within 45 days of receipt of this letter outlining how the facility will reduce or eliminate the current introduction of PFAS compounds to the site.
- 2) A comprehensive assessment of on and offsite PFAS groundwater, soil and surface water contamination needs to be implemented according to the requirements of North Carolina 2 L Rules, 15A NCAC 02L. Where a groundwater standard has not been established for a particular substance, the detection of that substance at or above the practical quantitation limit constitutes a violation of the standard.
- 3) The assessment shall include an analysis of: i) the source and cause of contamination; ii) the horizontal and vertical extent of soil and groundwater contamination and all significant factor affecting contaminant transport; and iii) geological and hydrogeological features influencing the movement, chemical, and physical character of the contaminants. This assessment should also identify any groundwater seeps



contributing to surface water contamination at the site and areas with significantly contaminated sediment.

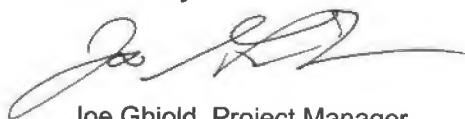
- 4) Obtain Groundwater samples for PFAS and analyze them using EPA Method 537.1, including fluorotelomers 6:2FTS and 8:2 FTS.

Please note that the following information was identified in the "Supply Well and Surface Water Sampling Report":

- All field blanks collected had PFAS with total concentrations ranging from 13.3-44.3 ng/L total PFAS. This is higher than normal. Typically, detections in blanks are infrequent and the detections of all PFAS summed rarely exceed 10ng/L total PFAS.
  - We suggest that the consultant's sampling team review practices and make necessary adjustments to reduce sampling contamination. Consider that if the field blank is prepared at the highly contaminated site then there is more chance of cross contamination. It may be necessary to prepare separate field blanks for suspected low contamination sites and suspected high contamination sites. See the "Clean Hands Dirty Hands" method for trace level sampling.
  - At this time, the drinking water samples were below the EPA Health Advisory Level (70 ppt) for PFOA and PFOS so the results are still usable.
- 5) A report identifying the findings of the assessment activities should be submitted to our attention within 6 months of receipt of this letter, including monthly updates via e-mail.
  - 6) NCDEQ suggests that a meeting with the City of Charlotte be scheduled to discuss a planned assessment approach and any concerns or questions it may have regarding this comprehensive assessment request.

We look forward to the successful completion of site activities and reviewing the subsequent report.

Sincerely,



Joe Ghiold, Project Manager  
Facility Management Branch  
Hazardous Waste Section

Ec: Matt Bramblett, Hart & Hickman  
Bud McCarty, NCDEQ

Andrew Martin, NCDEQ  
Joe Ghiold, NCDEQ

